

Before The
Federal Communications Commission
Washington D.C. 20554

In the matter of

Petition for proposed	)
Changes in 47 CFR Part 97.25	) RM-11760
License term for Amateur Radio	)

COMMENT of BRUCE PERENS

1 Introduction of the Author

Rather than repeat my introduction, please see my comment at <http://apps.fcc.gov/ecfs/document/view?id=60001328738> pages 2 and 3.

2 The Matter at Hand

Before us is the relatively minor issue of how long the term of a Radio Amateur license should be. Mr. Mark F Krotz, who holds Amateur station license N7MK, proposes to change the language of §97.25 to make the term lifelong rather than its present 10 years. His proposal is well-formed and offered in good will.

Mr Krotz presents as examples of similar action the fact that the GROL license is already lifelong, and that the FAA issues permanent Airman Certificates. He suggests “the spirit of deregulation” as a justification, and that eliminating FCC's present responsibility to process 300 license renewals per work-day will result in a cost and personnel reduction.

Certainly the Amateur Radio world will not end if the proposal of Mr. Krotz is enacted. However, we should consider the effects of such an action, and examine his justification.

3 Cost as a Justification

Mr. Krotz presents cost as his main justification, both in financial outlay and required personnel. I recently filed Form 605 to change my address. This process was extremely similar to license renewal, using the same form but without a payment. The process appeared to have been entirely automated, involving no FCC personnel in the transaction as far as I was aware. A physical “Official Copy” of the new license was mailed to me, although I had already received service of this copy online via a PDF file.

There was no separate charge for this address change and the production of a modified license, it appears to have been covered by my decadal license fee.

The computerized process which is presently used for renewal must continue to exist, since it is also used for address and name changes, callsign changes, requests for vanity callsigns. Thus the cost of maintaining the software must continue to exist.

It may be that the main cost reduction which can be realized through lifetime Amateur licensing is only that of printing and postage for the “Official Copy” of the license which FCC sends, a cost that would still be endured whenever there is a license change. This cost can be mitigated by charging a separate fee for a physical copy rather than the PDF file which is distributed online today. The actual license, since a recent rule change, is a database record at FCC. All paper licenses posted to Amateurs by FCC are thus copies, and not strictly necessary.

4 NCVEC As The Data Entry Service

NCVEC has already taken on the task of administering all Amateur license examinations other than those required in an administrative action by FCC. NCVEC performs the data-entry for the initial license application. NCVEC offers the service of license renewal as well, including the data entry. The Amateur can choose one of three NCVEC entities to perform this service: ARRL, W4VEC, or W5YI-VEC.

5 Transferring the Remaining Burden of Routine Amateur Administration to NCVEC

ARRL presently operates the *Logbook of the World* (LOTW). It handles records of Amateur communications worldwide, a *much* higher-bandwidth task than license administration. I have examined the architecture of the LOTW system, and it is the work of the finest computer scientists. To secure LOTW, ARRL uses x.509 public-key encryption. To cryptographically certify Radio Amateurs, ARRL enacted its own x.509 cryptographic certification authority, and properly submitted to ITU-T for standardization the technical changes necessary for x.509 to handle Amateur Radio.

As a result of the system that ARRL built for LOTW, ARRL has the capability today to cryptographically identify a remote Internet user as a specific licensed Radio Amateur. It then accepts cryptographically identified and secured data transfers from that Amateur which are uploaded to the logbook. ARRL operates the entire infrastructure necessary to operate this process, including the production of cryptographic certificates which currently identify 91,341 Amateurs in 304 countries.

LOTW is a technical achievement of sufficient size that it is likely a similar Amateur team could create and administer a system to administer Amateur licenses. Thus, I submit that NCVEC, and its member ARRL, have the computer capability to operate the system of routine Radio Amateur administration.

The radio authorities of many nations trust their national radio societies to operate the Amateur licensing structure, except for administrative actions. NCVEC provides a better alternative than a single national radio society: a triumvirate of organizations so that there is no monopoly, and less potential for conflict-of-interest.

Thus, I suggest that a better and more thorough means to reduce cost than Mr. Krotz suggests would be to offload the task of routine Amateur license administration, and operation of the computer database involved and its applications, to NCVEC.

6 The Cost of Change

A significant present cost to FCC is the burden of changing the computer system every time there is a change to the Amateur licensing structure. An ARRL official recently told me that FCC staff complain that this process is odious, and that it is thus a barrier to restructuring of the Amateur licensing.

I work in Silicon Valley, where the cost of a database change appears to be lower than that in a Federal administration. Most web businesses are database-intensive and rapidly changing, and database changes can be enacted by a single programmer in a few hours at most, without significant administrative overhead. By offloading the burden of database design to NCVEC, technical burdens that presently increase the cost of Amateur rule changes would be reduced, and would be the burden of Amateurs rather than FCC and the taxpayer.

7 Callsigns and Statistics

The pool of Amateur callsigns is limited, and certain callsigns are desired by Amateurs as vanity licenses. The mechanism of renewal facilitates returning callsigns to the pool to be reallocated when an Amateur is deceased or simply loses interest in Amateur Radio. My own callsign was previously held by an Amateur who is now deceased, and it was returned to the pool for reallocation.

Similarly, the database of licensed Amateurs is of statistical interest to Amateurs themselves. For example, this data told us that the number of Amateurs was diminishing

before the end of the Morse Code requirement, has increased since, and is perhaps reaching a peak. Thus, callsign data that is reasonably up to date helps us understand how policy changes change the viability of the Amateur service.

Without renewal, we would in general miss the fact that an Amateur is deceased or has become permanently inactive. Callsigns would be unavailable for decades.

8 Fees and Enforcement

Many Amateurs bemoan the lack of enforcement today. There is an obnoxious minority of operators who routinely interfere, operate outside of the rules, and make the service less useful and less fun for everyone else. The cost of proper enforcement should be reflected in Amateur license costs, and the Amateurs themselves can enact scholarships for those who can not afford increased licensing fees. Many of us would be happy to pay more for our licenses, and *more often*, if FCC would hire some new sheriffs for the Amateur service.

Obviously, making the license lifelong removes the opportunity for FCC to collect a renewal fee which can be used for enforcement.

Whether it is in this proceeding or another, we need to do *something* about the lack of enforcement. There are many possible economic structures to fund an increase in enforcement officers and staff for the Amateur service.

9 Summation

The proposal of Mr. Krotz has already been useful in providing a venue for this discussion. But I believe that his proposal as written suggests the wrong change. FCC should instead explore the transfer of the routine administration of the Amateur service to NCVEC, including the computer operations, and realize a decrease in cost and increase in agility for future rule-changes by doing so.

Respectfully Submitted

/S/ Bruce Perens